



Suite 306, Gateway Centre II  
4th & State Avenue, Kansas City, KS 66101 • (913) 621-6240

TECHNICAL ASSISTANCE TEAM FOR EMERGENCY RESPONSE REMOVAL AND PREVENTION  
EPA CONTRACT 68-01-6669

Site	Rose, Motha
ID#	MOD980633069
Break	1.2
Other	Weston-Sper
	6-16-86

TO: Ron McCutcheon, EP&R/ENSV

June 16, 1986

THRU: *RV* Robert L. Sholar, Region VII TATL

TAT-07-F-01564

FROM: Robert L. Fine, Region VII TAIM

TDD #07-8605-30

SUBJECT: Rose Chemical Cleanup  
Holden, Missouri

PCS #5330

During the week beginning May 27, 1986, Robert Fine of the Region VII TAT began monitoring the responsible party cleanup of PCB contaminated materials at Rose Chemical Company in Holden, Missouri. The site was visited by the TAT on May 27, 28, and 29. By Friday, May 30, ETI and American Steel personnel had removed several drums of contaminated soil from a tributary of the East Branch of Pin Oak Creek and had excavated around the storm drain manhole cover where the PCB oil drained during the spill. Flow-through fences made of chicken wire and straw were constructed downstream of the spill and absorbent pads were laid down on the creek in an effort to collect the oil. Using sheets of absorbent material, some of the oil atop the containment ponds was skimmed off, but work has since stopped and a sheen remains on the water's surface. In the area where the tanker leaked, a 12 inch berm made of soil and gravel has been constructed to hold any material should another spill occur, and the tanker which caused the spill has been drained and the area around it cleaned up.

On the 29th it was stressed to Don Seymour, ETI representative on site, that excavation of contaminated soil from the diversion ditch and the containment ponds should begin as soon as possible. The TAT was assured that arrangements were being made and that work could begin as early as the next day, contingent upon negotiations with a local heavy equipment operator. Beginning the evening of the 29th, 24 hour site security was initiated by ETI and American Steel personnel.

Overall, during the week ending June 1, significant actions were taken to mitigate PCB contamination of the creek and stabilize conditions around the tanker which leaked, however, a majority of the cleanup still remained to be done.

On Monday, June 2, Fine returned to the site to continue monitoring the cleanup and found nothing at all being done. When ETI representative Don Seymour and American Steel foreman Pat Perrin were questioned concerning this sudden halt in cleanup activities, it was learned that each company was adopting a 'wait and see' attitude until an upcoming meeting at the

Roy F. Weston, Inc.

SPILL PREVENTION & EMERGENCY RESPONSE DIVISION

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Regional Office on June 3 could hopefully settle some disputed claims of liability.

At the meeting on June 3 with EPA and representatives of all parties named in the CERCLA 106 Order, a verbal agreement was reached whereby Walter Carolan (owner of Rose Chemical and American Steel) and ETI would provide additional personnel to expedite the cleanup process. It was also made known that EPA wanted a site security fence to be installed as soon as possible (reference memo from George Hess to Walter Carolan concerning fence specifications).

George Hess, EPA/ENSV, Steven Kinser, EPA/WTMG, and Robert Fine returned to the site on June 5 to check on the cleanup and meet with Pat Perrin and Dwight Thomas of American Steel. Hess and Fine sat down with Thomas and radically modified a sampling plan for the creek tributary he submitted to EPA the day before. Presently, the schedule calls for Thomas to sample the area on June 16 under the supervision of TAT. Splits will be provided to EPA. After American Steel has analyzed a sample and found it to contain less than 2 ppm PCB, the EPA lab will run their corresponding split to check it out. Any section found to contain greater than 2 ppm PCB will have more soil removed and be resampled until it meets the cleanup criteria.

On Monday, June 9, Fine was informed by Don Seymour that ETI intended to pull out of the cleanup all together. Of the remaining parties named in the Order, none appear to have any intentions of doing any more than what has been mentioned. Also, Dwight Thomas has said that unless American Steel receives funding from someone else, the site security fence will not be installed either.

Since American Steel personnel continue to work on site, there is an immediate and significant risk of harm to human health as well as the environment. An open containment pond adjacent to where the tanker leaked has been sampled and found to contain sludges with PCB concentrations of approximately 360 ppm. Likewise, the diversion ditch and two other containment ponds are contaminated. These ponds are in poor condition and stand a good likelihood of overflowing during a hard rain. The storm drain pipe leading from the tank farm to the creek tributary is also contaminated. As brought out in the meeting with EPA on June 3, the site security fence is inadequate and the presence of trained security personnel is also lacking. A site visit on June 12 found the designated person for security to be the same person who at other times has been observed to be mowing the grass or doing secretarial work.

At the west end of the facility, and located outdoors, several storage areas contain thousands of gallons of contaminated oil in aboveground tanks. These tanks are surrounded by earthen berms which have been collecting rainwater and thus reducing their containment capacity should a spill occur. This situation places the tank farm in potential violation of SPOC guidelines.

According to the CERCLA 106 Order issued on May 23, 1986, those 'persons' named (except for Lear Siegler and the City of Holden) have failed to comply with several of the outlined Immediate and Initial Response Actions, as witnessed by Robert Fine on several site visits, the most recent being June 12.

The following list some, but not necessarily all, of these actions.

- o Removal and containerization of all free-flowing oils resulting from the spill.
- o Excavation and containerization of all contaminated soils, tributary and creek sediments, and other materials resulting from the spill.
- o Establishment of twenty-four (24) hour security on-site with the presence of trained security personnel at all times.
- o Construction of a complete EPA approved chain link security fence surrounding the Holden facility to prevent access to unauthorized personnel.

Though negotiations may be continuing with the generators and other potential responsible parties, it is felt that the situation at this site warrants immediate attention in the area of site stabilization and cleanup.

  
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ROBERT L. FINE  
Region VII TATM

RLF/dm